

# advocates for justice chartered attorneys

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February 26, 2024

## By ECF

Hon. Taryn A. Merkl  
United States Magistrate Judge  
United States District Court  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: Sylla, et al. v. Amazon Labor Union et al.  
Civil Case No. 23-05261 (AMD)  
Possible Assistance Needed

Dear Judge Merkl:

I write with consent of counsel for Defendant.

With the assistance of the Neutral Monitor agreed to by the parties (Richard Levy, a union lawyer with 55 years in the field), the parties will be commencing the five-day referendum about whether to hold a union election, as set forth in the consent order.

The best way to hold this referendum is to set up a table/tent for voters to vote just to the side of the front door of the Amazon Warehouse, within the parking area. We do not know what Amazon's response will be. Sometimes they do not interfere in union activity in that area, and sometimes they do. We are hoping that this won't be a problem. But we want the Court, and Amazon counsel (who I have copied), to be aware that if they do force us to move to a location outside of the parking lot, we will seek the Court's assistance under the All-Writs Act.

Note, we will need greater cooperation from Amazon should the members vote to hold an election. We hope that the Court's help won't be needed, but it is provided for in the consent order.

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Thank you for your consideration.

Respectfully submitted,

*/s/ Arthur Z. Schwartz*

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